

**RAAB, STURM & GANCHROW, LLP**

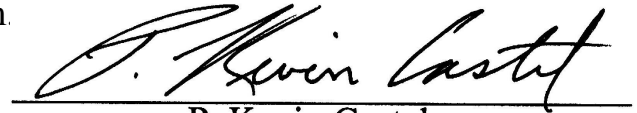
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RONALD RAAB\*  
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Conference adjourned from April 24, 2020  
to June 29, 2020 at 12:30 p.m.  
SO ORDERED.

Dated: 4/17/2020

MAURA E. BREEN\*\*\*  
SAMUEL R. BLOOM\*\*\*\*\*



**P. Kevin Castel**  
United States District Judge

April 17, 2020

**VIA ECF ELECTRONIC FILING**

Hon. P. Kevin Castel, U.S.D.J.  
Southern District of New York  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street, Courtroom 11D  
New York, N.Y. 10007

**Re: Building Service 32BJ Health Fund, et al. v. Facilities Source Corporation**  
**Civil Action No. 19-cv-11343**

Dear Judge Castel:

Our firm represents the Plaintiffs Building Service 32BJ Benefit Funds (the "Funds"), the Plaintiffs in the above-referenced matter. Presently, there is an Initial Conference scheduled before Your Honor for April 24, 2020 at 10:30 a.m. The Funds ask that this Conference be adjourned *sine die*. This Conference was previously adjourned once.

Defendant Facilities Source Corporation ("Defendant") has, to date, not appeared in this action. As a result, a Clerk's Certificate of Default was issued, and the Funds subsequently filed a Motion for Default Judgment, returnable February 10, 2020. The Court, in granting the initial request to adjourn the Conference, pointed to fatal errors in Plaintiffs' motion papers. Those errors were fixed, and the Funds filed a second Motion for Default Judgment on February 20, 2020. See ECF Document Nos. 16-17. Defendant was duly served with the motion papers. See ECF Document No. 18. To date, Defendant has not filed any opposition papers, and the deadline to respond has passed. Given that the Court's pending ruling on this Motion could result in issuance of a final Judgment in favor of the Funds, the Funds ask that the Conference be adjourned *sine die* or, alternatively, to a date after the Court's resolution of the pending Motion.

Thank you for your attention to this matter. If you have any questions or concerns, please do not hesitate to contact me.

Respectfully submitted,

/s/ Samuel R. Bloom

Samuel R. Bloom